

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

ALVA JOHNSON,
Individually and On Behalf of All Others
Similarly Situated

Case No.: 8:19-cv-475-T-02SPF

Plaintiff,

vs.

DONALD J. TRUMP
In his Individual Capacity and
DONALD J. TRUMP FOR PRESIDENT,
INC.,

Defendant,

_____ /

MOTION FOR PERMISSION FOR
TANYA S. KOSHY TO APPEAR *PRO HAC VICE*

Janet R. Varnell of the law firm of Varnell & Warwick, P.A., as counsel for Plaintiff, Alva Johnson, on behalf of herself and all others similarly situated (“Plaintiff”), hereby respectfully requests that this Court enter an Order permitting TANYA S. KOSHY to appear *pro hac vice* as co-counsel for Plaintiff in this action. In support of this Motion, the undersigned states as follows:

1. This application is made pursuant to Local Rule 2.02 of this Court.
2. Ms. Koshy is not a Florida resident, practices from her office in Oakland, California. where she is a member in good standing of the State Bar of California as well as the U.S. District Court for the Northern District of California.
3. Ms. Koshy is an associate attorney at the law firm of Tycko & Zavareei, LLP, with offices at 1970 Broadway – Suite 1070, Oakland, CA 94612.

4. Ms. Koshy is familiar with the Rules of this Court, including Rule 2.04, and is familiar with, and will be governed by, the Code of Professional Responsibility and other ethical limitations or requirements governing the professional behavior of members of the Florida bar.

5. Ms. Koshy has not been the subject of disciplinary action in the last five years by any bar or courts of any jurisdiction in which she has been licensed and has never been denied admission to the courts of any state or federal court during the last five years.

6. The privilege afforded by Local Rule 2.02 has not been utilized by Ms. Koshy to such a degree as to constitute the maintenance of a regular practice of law in the State of Florida.

7. In accordance with the local rules of this Court, Ms. Koshy's Special Admission Attorney Certificate form completed by Ms. Koshy has been forwarded to the Clerk of the Court. It is further certified that Ms. Koshy has complied with the fee and e-mail registration requirements as required by Local Rule 2.01(d).

8. Tanya S. Koshy, by and through designated counsel and pursuant to Rule 2.02 of the CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to tkoshy@tzlegal.com.

9. Ms. Koshy is associated with local counsel, Janet R. Varnell, of the law firm of Varnell & Warwick, P.A. Ms. Varnell is a resident of Florida and maintains an office in this District for the practice of law. She is a member in good standing of the Florida Bar and is an active member to the bar of this Court. She is the person with whom the Court and opposing counsel may readily communicate, upon whom all notices and papers may be served, and who will be responsible for the progress of the case, including the trial in default of the non-resident attorney, Ms. Koshy.

Rule 3.01(g) Certification

Counsel for Defendants have not entered an appearance and pursuant to Local Rule 3.01(g), the undersigned is unable to confer with opposing counsel to determine if they have any objection to the relief sought in this motion.

WHEREFORE, the undersigned respectfully requests that this Court enter an Order permitting Ms. Koshy to practice before this Court for the limited purposes of representing Plaintiff in this action.

Dated: February 28, 2019

VARNELL & WARWICK, P.A.

By: /s/ Janet R. Varnell
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 28, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Janet R. Varnell
Janet R. Varnell

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ORDER ON MOTION FOR ADMISSION TO APPEAR PRO HAC VICE

THIS CAUSE came before the Court upon Janet R. Varnell's Motion under Local Rule 2.02 asking the Court to allow Tanya S. Koshy for Admission to Appear Pro Hac Vice on behalf of Plaintiff in this case. Having considered the motion and all other papers submitted and the records and files herein, and having determined that all conditions to admission as counsel *pro hac vice* have been satisfied, it is

ORDERED AND ADJUDGED that the Motion for Admission for Tanya S. Koshy to Appear *Pro Hac Vice* is GRANTED.

DONE AND ORDERED in Tampa, Florida, this ____ day of _____, 2019.

Sean P. Flynn
United States Magistrate Judge

Copies furnished to:
All counsel of record